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**May 9, 2022**

**Honorable John K. Sherwood**  
**United States Bankruptcy Court**  
**50 Walnut St,**  
**Newark NJ 07102**

**Re: Case No. 22-13166**  
**PETITION of COUZ RESTORATION LLC**

**Dear Judge Sherwood:**

**This letter is written in response to the Order to Show Cause to dismiss for failure to file documents returnable before the Court on May 10, 2022.**

**I have represented the Debtor since April 19, 2022 at which time I was engaged by Debtor's principal Barbara McClendon to file a Chapter 7 Petition on an emergent basis to prevent a Sheriff's sale of the one of the LLC's properties. Accordingly I filed a Petition with deficiencies. I have attempted to communicate with the Debtor's principal over the past 10 days to arrange to complete the balance of the deficient documents. I am not otherwise familiar with the Debtor, except that I have been advised by Ms.McClendon that it owns approximately 21 residential properties in the Essex County area in various states of rehabilitation. To my knowledge this is a one member limited liability company and I am not aware of any other members, officers, directors or other persons with knowledge of the company's affairs. I did advise Ms. McClendon on the one and only time I met with her that we needed to do a massive amount of work to get all of the necessary information to complete the bankruptcy filing. I have since called, left messages and sent emails. The only response I received was on Friday afternoon May 6, 2022 at which time she responded in an email and advised me that she was ill and living with family. I asked to her try and be**

available on Sunday May 8 and Monday May 9, but I have not since heard from her.

I would respectfully request an adjournment to allow a reasonable amount of time to communicate with the client and prepare the documentation. Thank you for your attention to this matter.

Very truly yours,



NOAH M. BURSTEIN

NMB/ms

Cc: Ms. Barbara McClendon